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Attorneys for Defendant

GOOGLE LLC

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

ANIBAL RODRIGUEZ, *et al.* individually and on  
behalf of all others similarly situated,

Plaintiff,

vs.

GOOGLE LLC, *et al.*,

Defendant.

Case No. 3:20-CV-04688-RS

**GOOGLE LLC'S RESPONSE TO  
PLAINTIFFS' RENEWED AND  
AMENDED MOTION TO DIRECT  
NOTICE TO MEMBERS OF THE  
CERTIFIED CLASSES [DKT 395]**

Date: June 13, 2024

Time: 1:30 p.m.

Ctrm: 3 - 17th Floor

Judge: Hon. Richard Seeborg

Action filed: July 14, 2020

Trial Date: February 10, 2025

On April 26, 2024, Plaintiffs filed a Renewed and Amended Motion to Direct Notice to Members of the Certified Classes (“Motion”) that included updated forms of notice to account for the Court’s April 5, 2024 Order Granting in Part Google LLC’s Motion to “Clarify” the Class Definition. As Plaintiffs noted therein, Google LLC (“Google”) agreed to the updated forms of notice and only two open questions concerning the direct notice by email portion of the notice plan remained: whether direct email notice should be sent (1) directly to end users of Google Workspace for Education suite accounts, a type of Enterprise account; and (2) to parents supervising a Google Account for users under age 13 (“Unicorn accounts”) in addition to the Unicorn account. Plaintiffs and Google have come to a resolution on both issues: Google has agreed to allow direct email notice to be sent to both of the aforementioned parties.

In light of that agreement, Google submits herewith one revised and one additional form of notice: (1) a notice to Google Workspace Administrators to apprise them of the fact that their end users will be receiving class notice, and (2) a revised notice for parents/guardians supervising Google Accounts for users under age 13. Both were drafted in collaboration with Plaintiffs, consistent with the Court’s April 5<sup>th</sup> Order, and both are supported by the Class Notice Administrator (“Epiq”). Both are attached as exhibits to the Declaration of Eduardo E. Santacana in Support of Google’s Response to Plaintiffs’ Amended Motion to Direct Notice filed herewith.

For the foregoing reasons, Google respectfully requests that the Court approve Google’s email notice to Google Workspace Administrators and email notice to parents/guardians supervising Google Accounts for users under age 13.

Dated: May 10, 2024

Respectfully submitted,

WILLKIE FARR & GALLAGHER LLP

By: /s/ Eduardo E. Santacana

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